

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOHANNA NIEVES FLORES

DEBTOR

CASE NO 13-03934/BKT

CHAPTER 13

**DEBTORS' REPLY TO MOTION REQUESTING DISMISSAL  
DOCKET NO. 71**

TO THE HONORABLE COURT:

**COMES NOW, JOHANNA NIEVES FLORES**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Reliable Financial Services, Inc. ("Reliable") filed a *Motion Requesting Dismissal*, dated January 24, 2018, Docket No. 71, in the above captioned case.

2. Debtor hereby respectfully submits evidence which shows that debtor made payment in the amount of \$1,206.45, which payment cures any and all arrears with Reliable Financial Services. Attached is evidence of Payment.

**WHEREFORE** the Debtor respectfully prays that Reliable motion requesting dismissal for failure to make current Plan payments, Docket No. 71, be denied.

**I HEREBY CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; Carlos Perez Pastrana, Esq., Counsel for Reliable Financial Services, Inc., and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: Debtor, Johanna Nieves Flores, HC 06 Box 70922, Caguas, PR 00725, in the above captioned case.

Page - 2-  
Debtors' Reply to Motion Requesting Dismissal  
Case no. 13-03934/BKT13

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 13<sup>th</sup> day of February,  
2018.

/s/ Roberto Figueroa Carrasquillo  
USDC #203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
PO BOX 186 CAGUAS PR 00726-0816  
TEL 787-744-7699 FAX 787-746-5294  
EMAIL: rfigueroa@rfclawpr.com

**From:** "Johanna Nieves" <jnieves@uprparking.com>  
**Date:** Monday, February 12, 2018 9:51 AM  
**To:** <dimaris@fslawpr.com>  
**Subject:** FW: Payment Confirmation

**From:** Johanna Nieves [mailto:jnievesj69@gmail.com]  
**Sent:** Monday, February 12, 2018 8:59 AM  
**To:** Noel Carrasquillo <noelortiz.nc@gmail.com>; Johanna Nieves <jnieves@uprparking.com>  
**Subject:** Fwd: Payment Confirmation

----- Mensaje reenviado -----

De: <noreply@evertecinc.com>  
Fecha: El lun, 12 de feb. de 2018 a las 8:50 a. m.  
Asunto: Payment Confirmation  
Para: <jnievesj69@gmail.com>

Reference Number: **8c48ac24fab66b7**

Save or print the following information as evidence of payment.

<i>Merchant:</i>	<i>Account:</i>	<i>Email:</i>	<i>Amount</i>
<b>Reliable Financial</b>	063187199	<u>jnievesj69@gmail.com</u>	<i>Paid:</i>
PO BOX 21382			\$
San Juan, PR 00928-1382			1206.45

Transaction Date	Authorization #	Client	Payment Method	Description of Payment
2/12/2018 8:50:47 AM	194858	johanna nieves flores	Tel Checking (*****7098)	Paid by Phone

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Sent from Gmail Mobile

2/12/2018